

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MICHAEL D. COHEN,  
Plaintiff,

v.

UNITED STATES OF AMERICA, DONALD J. TRUMP, former President of the United States, WILLIAM BARR, former Attorney General of the United States, MICHAEL CARVAJAL, Director of the Bureau of Prisons, JON GUSTIN, Administrator of the Residential Reentry Management Branch of the Bureau of Prisons, PATRICK McFARLAND, Residential Reentry Manager of the Federal Bureau of Prisons, JAMES PETRUCCI, Warden of FCI Otisville, ENID FEBUS, Supervisory Probation Officer of the United States Probation and Pretrial Services ADAM PAKULA, Probation Officer of the United States Probation and Pretrial Services, and JOHN and JANE DOE (1-10) agents, servants, and employees of the United States,

Defendants.

Case No.: 3:20-cv-01701 (SRU)

**DEFENDANT DONALD J. TRUMP'S INITIAL DISCLOSURES**

In accordance with Federal Rule of Civil Procedure 26(a), Defendant, Donald J. Trump ("Defendant"), by and through his attorney, Habba Madaio & Associates LLP, makes the following disclosures. Defendant expressly reserves his right to assert any applicable privilege, defense, immunity or objection, including, but not limited to, the attorney-client, work product executive and deliberative process privileges. These disclosures are based on information now reasonably available, identifiable and/or knowable to Defendant. In addition, Defendant expressly reserve his right to supplement, amend, clarify, revise, and/or correct any or all of the disclosures herein at any time.

i. The following individuals are likely to have discoverable information that Defendant may use to support his claims or defenses:

**Defendant is unable to identify any individuals with discoverable information at this time.**


ii. The following categories of documents are in the possession, custody, and control of Defendant and may be used by Defendant to support one or more of his defenses:

**Executive Office of the President policy and procedure documents regarding the scope of presidential duties.**

iii. The requirements set forth in Rule 26(a)(1)(A)(iii) and Rule 26(a)(1)(A)(iv) are not applicable to Defendant.

Respectfully submitted,

Dated: April 18, 2022  
New York, New York

  
Alina Habba, Esq.  
HABBA MADAI & ASSOCIATES, LLP  
1430 U.S. Highway 206, Suite 240  
Bedminster, New Jersey 07921  
-and-  
112 West 34th Street, 17th & 18th Floors  
New York, New York 10120  
Phone: (908) 869-1188  
Fax: (908) 450-1881  
Email: ahabba@habbalaw.com  
*Attorneys for Defendant, Donald J. Trump*

To: Counsel of record via email